

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-00353-LJL

**RESPONSE TO
INFORMATION SUBPOENA**

Defendant, Rudolph W. Giuliani, hereby responds to the information subpoena, dated August 5, 2024:

RESPONSE TO REQUESTS:

1. State the nature and value of all property being held pursuant to the Restraining Notice served herewith.

Response: In addition to property identified below, property stored at the following:

- a. Corporate Transfer and Storage, 1 Comac Loop, # 14, Ronkonkoma, NY 11779. Value unknown.
- b. Property located at 45 East 66th Street, Apt. 10W, New York, New York. Value unknown.
- c. Property located at 315 S. Lake Drive, Unit 5D, Palm Beach, Florida, in particular, wristwatches. Value unknown.
- d. An automobile, registered at Palm Beach Condo, value unknown.

2. List any bank accounts, brokerage accounts, investment accounts, checking accounts, credit card accounts, and all other accounts, whether in the United States or any other country, in which you have or had an interest, whether in your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary, or in conjunction with any other persons or entities As to each such account, list the name of the financial institution having custody of the account, the exact name on the account, the date the account was opened, the account number, the names of the signatories on the account and the amount presently on deposit or, if closed, the amount on deposit when the account was closed.

Response:

Bank accounts:

Account Name:

Bank Name: Citibank

Exact Name on Account: Rudolph W. Giuliani
Date Opened: unknown
Account Number: [REDACTED] 1428
Names of signatories: Rudolph W. Giuliani
Account on Deposit (or amount on deposit when closed): \$33,453.20

Bank accounts:

Account Name:
Bank Name: Citibank
Exact Name on Account: Rudolph W. Giuliani
Date Opened: unknown
Account Number: [REDACTED] 5812
Names of signatories: Rudolph W. Giuliani
Account on Deposit (or amount on deposit when closed): \$unknown (Account blocked)

Bank accounts:

Account Name:
Bank Name: Citibank
Exact Name on Account: Rudolph W. Giuliani
Date Opened: unknown
Account Number: [REDACTED] 8958
Names of signatories: Rudolph W. Giuliani
Account on Deposit (or amount on deposit when closed): \$unknown – no access to account

Bank accounts:

Account Name:
Bank Name: Citibank
Exact Name on Account: Rudolph W. Giuliani and Judith S. Giuliani
Date Opened: unknown
Account Number: [REDACTED] 9639
Names of signatories: Rudolph W. Giuliani and Judith S. Giuliani
Account on Deposit (or amount on deposit when closed): \$25.64

Bank accounts:

Account Name:
Bank Name: Citibank
Exact Name on Account: Rudolph W. Giuliani Individual Retirement Account
Date Opened: unknown
Account Number: ending in 1677
Names of signatories: Rudolph W. Giuliani
Account on Deposit (or amount on deposit when closed): \$ Exempt

Bank accounts:

Account Name: Rudolph W. Giuliani
Bank Name: Bellwether Community Credit Union
Exact Name on Account: Rudolph W. Giuliani

Date Opened: Approximately July 2024

Account Number: [REDACTED]-1050

Names of signatories: Rudolph W. Giuliani

Account on Deposit (or amount on deposit when closed): \$1,092.85

Bank accounts:

Account Name: Rudolph W. Giuliani

Bank Name: Bellwether Community Credit Union

Exact Name on Account: Rudolph W. Giuliani

Date Opened: Approximately July 2024

Account Number: [REDACTED]-0100

Names of signatories: Rudolph W. Giuliani

Account on Deposit (or amount on deposit when closed): \$9,623.30

Bank accounts:

Account Name: Rudolph W. Giuliani

Bank Name: Bellwether Community Credit Union

Exact Name on Account: Rudolph W. Giuliani

Date Opened: Approximately July 2024

Account Number: [REDACTED]-1080

Names of signatories: Rudolph W. Giuliani

Account on Deposit (or amount on deposit when closed): \$28,314.39

Response:

Credit Card accounts:

Account Name: Citibank

Bank Name: Citibank

Exact Name on Account: Rudolph W. Giuliani

Date Opened: unknown

Account Number: xxx5491

Names of signatories: Rudolph W. Giuliani

Response:

Credit Card accounts:

Account Name: American Express

Exact Name on Account: Giuliani Partners LLC

Date Opened: 3/1/2002

Account Number: xx[REDACTED]3000

3. Identify any ownership interest you have in each Giuliani Affiliated Entity. As to each of such entity, to the extent you do not have total ownership, list the names and addresses of all other owners, their percent ownership, and the date their ownership started.

Ownership Interests in each Giuliani Affiliated Entity:

Giuliani Communications LLC – Rudolph W. Giuliani – 100%

Giuliani Partners LLC – Giuliani Group, LLC – 100%

Giuliani Security & Safety, LLC – Giuliani Partners LLC – 100%

Giuliani Group, LLC – Giuliani & Company LLC – 100%

Giuliani & Company LLC – Rudolph W. Giuliani – unknown percentage

Other members:

Michael D. Hess – unknown percentage

Dennison Young, Jr. 2016 Irrevocable Trust – unknown percentage

Anthony Carbonetti – unknown percentage

Steve Oesterle – unknown percentage

Daniel S. Connolly – unknown percentage

Eric Hatzimemos – unknown percentage

Geoffrey N. Hess – unknown percentage

Rudolph W. Giuliani PLLC – Rudolph W. Giuliani – 100%

World Capital Payroll Corporation – Rudolph W. Giuliani – 33.33%

Other members:

Anthony Carbonetti – 16.66%

Michael D. Hess – 16.66%

Steve Oesterle – 16.66%

Dennison Young, Jr. 2016 Irrevocable Trust – 16.66%

Standard USA LLC:

Rudolph W. Giuliani – 88% ownership started on August 30, 2024

Other members:

Maria Ryan – 10% - ownership started on August 30, 2024

Theodore Goodman – 2% - ownership started on August 30, 2024

4. Identify all assets (including real property and interests in any other entity) and any bank accounts, brokerage accounts, investment accounts, checking accounts, credit card accounts, and all other accounts, whether in the United States or any other country, of each Giuliani Affiliated Entity and any other entity under your control or established for your benefit or by you for the benefit of another. As to each such account, list the name of the financial institution having custody of the account, the exact name on the account, the date the account was opened, the account number, the names of the signatories on the account and the amount presently on deposit or, if closed, the amount on deposit when the account was closed.

Assets of each Giuliani Affiliated Entity including bank accounts, brokerage accounts, investment accounts, checking accounts, credit card accounts, other accounts:

Name of financial institution: Parkside Financial Bank & Trust, 7700 Forsyth Boulevard, Suite 1800, St. Louis, Missouri 63105

Name on the account: Giuliani Communications LLC
Date account opened: 12/18/2023
Account Number: xxx7580
Names of signatories on account: Account was frozen in 8/20/24
Account on Deposit (or amount on deposit when closed):

Name of financial institution: Flagstar Bank
Name on the account: Giuliani Communications LLC
Date account opened: Approximately 3/1/2023
Account Number: [REDACTED] 5700
Names of signatories on account: Bank closed all accounts 11/30/2023
Account on Deposit (or amount on deposit when closed):

Name of financial institution: Flagstar Bank
Name on the account: WorldCapital Payroll Corp.
Date account opened: Approximately 3/1/2023
Account Number: [REDACTED] 5751
Names of signatories on account: Bank closed all accounts 11/30/2023
Account on Deposit (or amount on deposit when closed):

Name of financial institution: Flagstar Bank
Name on the account: Giuliani Partners LLC
Date account opened: Approximately 3/1/2023
Account Number: [REDACTED] 5005
Names of signatories on account: Bank closed all accounts 11/30/2023
Account on Deposit (or amount on deposit when closed):

Name of financial institution: Flagstar Bank
Name on the account: Giuliani Security & Safety LLC
Date account opened: Approximately 3/1/2023
Account Number: [REDACTED] 4699
Names of signatories on account: Bank closed all accounts 11/30/2023
Account on Deposit (or amount on deposit when closed):

5. Bank accounts, brokerage accounts, investment accounts, checking accounts, credit card accounts, and all other accounts established for your benefit, including any political action committee or similar fund, not already listed in response to any earlier request:

Response:

Name of financial institution: Upon information and belief, TD Bank
Name on the account: Giuliani Freedom Fund Legal Defense T.R. Fund
Date account opened: unknown
Account Number:
Names of signatories on account: unknown
Account on Deposit (or amount on deposit when closed): unknown

6. Real property in which you have or had an interest, whether in your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons.

Response:

January 14, 2020, to date: 315 S. Lake Drive, Palm Beach, Florida – owned individually

February 11, 2010 to January 14, 2020: 315 S. Lake Drive, Palm Beach, Florida – owned by Rudolph W. Giuliani and Judith Giuliani.

7. All securities in which you have an interest, including but not limited to stock or interests in privately held companies, options, derivatives, futures, debt, bonds and/or debenture, including the name of the security, the amount held, the location of the security, and the values of each security.

Response:

Cooperative shares in 45 East 66th Street, Apt. 10W, New York, New York.

Securities are owned by Rudolph W. Giuliani in Individual Retirement Account, which are exempt.

8. Any safe deposit boxes or other depositories ever maintained by you and set forth (1) the name and address of the bank or other depository, (ii) the identification number of the box or depository, (iii) the present contents of the box or depository, and (iv) any contents previously removed from the box or depository, the date of their removal, the current location of the removed contents, and the reasons for the removal.

Response: None.

9. Identify all persons and entities that are indebted to you, including without limitation the (i) amount and date of the original indebtedness, (ii) the name and address of the debtor, (iii) the basis for the indebtedness, and (iv) the amount and date or any sum repaid by the debtor since the original indebtedness.

Response:

Trump 2020 Campaign and/or the Republican National Committee

Address: unknown

Basis for indebtedness: Work performed

Amount and Date repaid by debtor: None.

10. Identify all monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged by and between you and any entity owned or controlled by you (in whole or in part), and set forth (i) the nature and amount of the monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged, (ii) the nature of the payment, receipt, purchase, sale, transfer or exchange, (iii) the date of the payment, receipt, purchase, sale, transfer or exchange, (iv) the payor and recipients of the monies, stock, property or

other consideration, and (v) the consideration for the payment, receipt, purchase, sale, transfer or exchange.

Response:

Standard USA LLC

(i) the nature and amount of the monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged – **Response: Services provided to Standard USA LLC.**

(ii) the nature of the payment, receipt, purchase, sale, transfer or exchange - **Response: Services provided to Standard USA LLC.**

the date of the payment, receipt, purchase, sale, transfer or exchange - **Response: 10/24/2024 - \$50,000 (For August and September 2024)**

(iii) the payor and recipients of the monies, stock, property or other consideration - **Response: Standard USA LLC payor, Rudolph W. Giuliani, payee.**

(iv) the consideration for the payment, receipt, purchase, sale, transfer or exchange – **Response: Services provided to Standard USA LLC.**

Giuliani Communications LLC

(i) the nature and amount of the monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged – **Response: Services provided to Giuliani Communications LLC.**

(ii) the nature of the payment, receipt, purchase, sale, transfer or exchange - **Response: Services provided to Giuliani Communications LLC.**

(iii) the date of the payment, receipt, purchase, sale, transfer or exchange - **Response: 5/6/2024 - \$20,000; 5/21/2024 - \$25,000; and 6/28/2024 - \$55,000;**

(iv) the payor and recipients of the monies, stock, property or other consideration - **Response: Giuliani Communications LLC payor, Rudolph W. Giuliani, payee.**

(v) the consideration for the payment, receipt, purchase, sale, transfer or exchange – **Response: Services provided to Giuliani Communications LLC.**

11. Identify any property or money held in trust for you, and identify the trustee, the name of the trust, the law under which the trust is organized, the date of the creation of the trust, the person or entity and its address holding the property or money, and the nature and amount of property or money.

Response: None.

12. Identify any property or money that you have placed in trust for another person, and identify the person's address, the person's relationship to you, the trustee, the name of the trust, the law under which the trust is organized, the person or entity and its address holding the property or money, and the nature and amount of property or money, and the date of the creation of the trust.

Response: None.

13. Set forth the names and addresses of any person with knowledge or information concerning the nature, extent and location of any assets owned or controlled by you.

Response: Rudolph W. Giuliani, 315 S. Lake Drive, Palm Beach, Florida 33480.

14. Identify all sources of your income, including income to any Giuliani Affiliated Entity and any other entity under your control or established for your benefit or by you for the benefit of another.

Response: Standard USA LLC, 315 S. Lake Drive, Palm Beach, Florida 33480.

15. List any and all gifts you have given, the date the gifts were given, the recipient of those gifts, and the approximate cost of each gift.

Response: Four New York Yankees World Series Rings to Andrew Giuliani in or about 2018. Approximate cost is unknown.

16. Set forth the names and addresses of all the individuals who assisted or participated in providing information for, or formulating responses to, this Information Subpoena.